Talton Communications, Inc. March 1, 2019 – Second One-Time Mandatory Data Collection Description and Justification

The following are explanations for responses to FCC Form 2300:

- Talton Communications, Inc. ("Talton") does not bill or collect revenues nor do we incur the cost
 of service. All figures run through Global Tel*Link Corporation ("GTL") previously called Telmate,
 LLC ("Telmate") who sends Talton a portion of revenue. Revenue figures listed are top line
 revenue, not only Talton's share.
- Credit card processing fees for Talton sites are collected by GTL and will be reported in their ICS data. Talton does not bill, collect, or receive proceeds from these fees.
- Automated Payment Fee (APF) Revenues are only available in the aggregate by site by year.
 These are collected by GTL and not itemized by service type.
- ICS Direct Costs: Talton's figure for Adelanto each year includes circuit, international transport, and parts replacement costs for all Talton sites for the entire year.
- Total ICS Direct Costs: Includes international transport, repair costs and circuit costs.
- Total CCPS Revenues: Credit card fees are a pass-through.
- Average Daily Population (ADP): ICE does not share ADP with Talton. The figures reported are estimates.
- Number Of Prepaid Calls: Prepaid calls are paid by called party.
- Number Of Debit Calls: Debit calls are a mix of called party and detainee prepaid.
- Prepaid MOU: Prepaid calls are paid by called party.
- Debit MOU: Debit calls are a mix of called party and detainee prepaid.
- CCPS Revenues: These figures are collected by GTL (previously Telmate). Talton does not have access to this information.
- ICS Direct Costs: Figure is only available in aggregate for the year and includes international transport costs, replacement parts and circuit costs.
- Variable Site Commissions: Talton's contract is a zero-commission contract.
- Fixed Site Commissions: Talton's contract is a zero-commission contract.
- Total International ICS Costs: Included in ICS Direct Costs. See explanation above.